UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF WISCONSIN

In re:

Michael A. Gral,

    Debtor.

Case No. 16-21329
Chapter 7

**OBJECTION TO MOTION BY WILMINGTON SAVINGS FUND SOCIETY, FSB, NOT IN ITS INDIVIDUAL CAPACITY BUT SOLELY AS TRUSTEE FOR THE PRIMESTAR-H FUND I TRUST FOR RELIEF FROM AUTOMATIC STAY AND ABANDONMENT RE: PROPERTY LOCATED AT:
6823 North Barnett Lane, Fox Point, Wisconsin 53217 (DOC 201)**

Debtor objects to the motion to obtain relief from the automatic stay and abandonment by Wilmington Savings Fund Society, FSB, as trustee for the PrimeStar-H Fund 1 Trust ("Movant"). Movant has renewed its motion to modify the automatic stay alleging that there is no equity in the property for the Debtor. That statement is untrue. In the motion, the Movant alleges that its collateral is worth $1,025,000.00. The movant has a first mortgage of approximately $560,000.00 and there is a second mortgage in favor of Johnson Bank in the amount of approximately $340,000.00. A third mortgage is subordinate to the Debtor's homestead exemption, which along with his spouse, totals $150,000.00. As a result, there is substantial equity.

Debtor intends to request to reaffirm the obligations to Movant.

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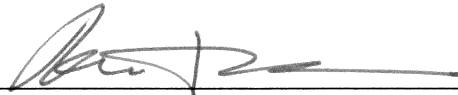Email: JGoodman@ameritech.net

Over the course of time, the Movant has not given proper credit for the adequate protection payments the Debtor has made up to the time the conversion of this case to one under Chapter 7 of Title 11 U.S.C.

WHEREFORE, Debtor demands that the Debtor requests that the motion be denied.

Dated this _____/_____ day of May, 2019.

LAW OFFICES OF JONATHAN V. GOODMAN
Attorneys for Debtor, Michael A. Gral

By: _____
Jonathan V. Goodman